



TITLE IX POLICY AND PROCEDURES

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50 Sunset Lane, Paxton MA 01612

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I. INTRODUCTION

A. Statement of Policy

Rooted in the Roman Catholic tradition of higher education, Anna Maria College is maintained and operated in conformity with the values of the Judeo-Christian tradition and in keeping with the ideals of its foundresses, the Sisters of Saint Anne. The College is committed to nurturing the development of a sense of respect for oneself and for others, as well as a sense of responsibility to society and the world. To stay true to the mission of the College, the environment at Anna Maria College must be free of sexual harassment including sexual assault, sexual violence, sexual harassment, sexual exploitation, sexual discrimination, gender-based harassment, domestic violence, dating violence, and stalking.

Sexual Misconduct is antithetical to the mission and values of the College and will not be tolerated. The College will respond to reports and formal complaints of Sexual Misconduct (as defined in this Policy) and will take prompt action to eliminate such conduct, prevent its recurrence, and remedy the adverse effects of such conduct in the College's programs and activities.

A Student, Employee or Third Party determined by the College to have violated this Policy will be subject to sanctions, up to and including the termination of their relationship with the College, withdrawal of the privilege to enter upon College property, and/or to participate in College sanctioned or supported activities and events.

B. Applicability

This Sexual Misconduct Policy ("Policy") applies to all members of the College community including students enrolled for credit or non-credit-bearing coursework ("Students"); College employees, including full-time and part-time faculty, staff, and administrators ("Employees"); as well as third parties such as contractors, vendors, visitors, and guests ("Third Parties") (collectively referred to herein as "Community Member").

This Policy will apply to any instance in which a Community Member is alleged to have engaged in Sexual Misconduct prohibited under this Policy against any person, regardless of the Complainant's or Respondent's sexual orientation or gender.

Where conduct in violation of this Policy also violates any other College policies, the College's response will be governed by the procedures described herein. Where this Policy applies, its provisions will supersede any conflicting provision contained in other College policies.

C. Reports and Formal Complaints of Prohibited Conduct

The College strongly encourages anyone who experiences, witnesses, or becomes aware of Sexual Misconduct to report such conduct immediately. This Policy specifically prohibits retaliation against any person who makes a good faith report or formal complaint of conduct prohibited under this Policy.

The College Title IX/Sexual Misconduct Coordinator and the Deputy Title IX/Sexual Misconduct Coordinator are the College officials with authority to institute corrective measures on behalf of the College with respect to alleged violations of this Policy.

The College will promptly respond to reports or formal complaints of prohibited conduct made in accordance with the requirements of this Policy. The College's response will include measures designed to stop the prohibited conduct, prevent its recurrence, and remediate any adverse effects of such conduct.

D. Period of Limitations

A report or formal complaint of Sexual Misconduct may be made at any time, regardless of the length of time between the occurrence of the alleged misconduct and the decision to report or file. However, the College strongly encourages individuals to report or file promptly. A delay in reporting or filing a formal complaint may compromise the College's ability to take action and effectively respond to the alleged misconduct, particularly if neither the Complainant nor the Respondent is employed by the College or enrolled as a Student at the time the Complaint is made.

E. Statement of Non-Discrimination and Coordination of Policies

The College is committed to adhering to all state and federal laws prohibiting discrimination in its educational programs and activities including employment on the basis of a person's race, sex, religion, color, national origin, age, marital or parental status, military service or veteran status, gender, disabilities, genetic information or other legally protected status, consistent with its Catholic identity and mission as permitted by law.¹

This Policy supports the College's commitment to compliance with Title IX of the Education Amendments of 1972 (Title IX), a federal civil rights law that prohibits discrimination on the basis of sex in education programs and activities, as well as other federal and state laws prohibiting discrimination in education and employment including Title VII of the Civil Rights Act of 1964 and The Massachusetts Fair Employment Practices Act, M.G.L. Ch. 151B.

Questions concerning the College's policies prohibiting sex-based discrimination including Sexual Misconduct, can be directed to the Title IX Coordinator, Corina Hendea, Director of Human Resources, Socquet House, CHendea@annamaria.edu, 508-849-3444.

Questions concerning other forms of prohibited discrimination and harassment can be directed to the College's Director of Human Resources, Corina Hendea, Director of Human Resources, Socquet House, CHendea@annamaria.edu, 508-849-3444.

In addition to making reports to the College, individuals may direct questions and/or

¹ The prohibition of forms of discrimination not covered by this Policy is addressed in the College's Non-Discrimination and Anti-Harassment Policy.

complaints regarding sex-based discrimination to the United States Department of Education Office for Civil Rights, at (OCR@ed.gov or (800) 421-3481), or to the United States Equal Employment Opportunity Commission, John F. Kennedy Federal Building, 475 Government Center, Boston, MA (617) 565-3200 and the Massachusetts Commission Against Discrimination, 484 Main Street, Room 320, Worcester, MA (508) 453-9630, concerning prohibited discrimination in employment.

F. Individuals with Disabilities

The College will provide appropriate accommodations for individuals with disabilities, to the extent necessary and available, to access and participate in the procedures outlined in this Policy. An individual seeking accommodation must notify the Title IX Coordinator of their need for accommodation. Requests for accommodations for Employees and Students may be reviewed in consultation with Human Resources and/or the Office of Accessibility Services.

G. College Title IX/Sexual Misconduct Coordinators

The College has designated Corina Hendea to serve as the College Title IX /Sexual Misconduct Coordinator.² The Coordinator is charged with oversight and coordination of the College’s activities with respect to Title IX compliance and the development and implementation of the College’s policies, procedures, and activities to prevent sexual misconduct and response to reports and formal complaints alleging conduct in violation of this Policy. The College has also designated Deputy College Title IX/Sexual Misconduct Coordinators (“Deputy Coordinator”) to assist the Coordinator in the discharge of these responsibilities.

The Coordinator is available to meet with any Community Member to discuss this Policy or any issues or concerns with respect to the College’s Title IX related policies, procedures and activities. The Coordinator and Deputy Coordinators can be contacted by telephone, email, or in person during regular office hours:

Title IX Coordinator	Corina Hendea, Director of Human Resources, Socquet House, CHendea@annamaria.edu, 508-849-3444.
Deputy Title IX Coordinator	Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall, jeckstrom@annamaria.edu, 508-849-3271

II. PROHIBITED CONDUCT

This Sexual Misconduct Policy prohibits forms of sexual misconduct as defined in Title IX regulations issued by the U.S. Department of Education (34 CFR Part 106) and other

² The Title IX Coordinator may designate the Deputy Title IX Coordinator or another qualified person to assume or assist in performing all or part of their duties under this Policy. Therefore, where the Coordinator is identified as the person responsible for some aspect of this Policy, such provision should be read with the understanding that any duty or function of the Coordinator, other than overall responsibility for the oversight and coordination of Title IX programs and compliance, may be performed by the Deputy or another qualified person designated by the Coordinator.

sexual misconduct prohibited by College that does not fall within the scope of Title IX. Conduct prohibited under this Policy includes the following:

A. Title IX – Sexual Harassment

Title IX Sexual Harassment includes all of the forms of conduct on the basis of sex set forth in this Section III (A) meeting the following requirements:

Jurisdiction – Title IX applies only when the alleged sexual conduct:

- Occurs within the United States; and
- Occurs within the College’s education program or activity, meaning
 - locations, events, or circumstances over which the College exercises substantial control over both the respondent and the context in which the Title IX Sexual Harassment occurs, and
 - any building owned or controlled by a student organization that is officially recognized by the College; and
 - at the time of filing a formal complaint, a complainant is participating in or attempting to participate in the education program or activity at the College.

Title IX – Sexual Harassment includes:

- **Quid Pro Quo Sexual Harassment:** An employee of the College conditioning the provision of an aid, benefit, or service of the College on an individual’s participation in unwelcome sexual conduct;
- **Sexual Harassment:** Unwelcome sexual conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive to Reasonable Person that it effectively denies an individual equal access to the College’s education program or activity;
- **Sexual Assault:** Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. Sexual assault can occur between individuals of the same or different sexes and/or genders. This includes the following:
 - **Rape:** The carnal knowledge of a person, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity;
 - **Sodomy:** Oral or anal sexual intercourse with another person, without the consent of the victim, including instances where the victim is incapable

of giving consent because of their age or because of their temporary or permanent mental or physical incapacity;

- **Sexual Assault with an Object:** To use an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity;
 - **Fondling:** The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental or physical incapacity;
 - **Incest:** Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law; or
 - **Statutory Rape:** Sexual intercourse with a person who is under the statutory age of sixteen (16).
- **Domestic Violence:** A felony or misdemeanor crime of violence committed: (a) by a current or former spouse or intimate partner of the victim; (b) by an individual with whom the victim shares a child in common; (c) by an individual who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (d) by an individual similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the felony or misdemeanor crime of violence occurred; (e) by any other individual against an adult or youth victim who is protected from that individual's acts under the domestic or family violence laws of the jurisdiction in which the felony or misdemeanor crime of violence occurred.
 - Intimate partner is defined as an individual with whom one has or had a short- or long-term relationship that provides romantic and/or physical intimacy or emotional dependence. Intimate relationships can occur between individuals of the same gender or different genders and may include (but are not limited to) marriages, civil unions, dating relationships, "hook-up" relationships, relationships in which partners are characterized as "girlfriends" or "boyfriends," and relationships between individuals with a child in common.
 - **Dating Violence:** Violence committed by an individual who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting individual's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the individuals involved in the relationship. This includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

- **Stalking:** Engaging in a course of conduct directed at a specific individual that would cause a reasonable person to: (a) fear for the individual’s safety or the safety of others; or (b) suffer substantial emotional distress. For the purposes of the Stalking definition: Course of conduct means two or more acts, including acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about an individual, or interferes with an individual’s property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

B. College - Other Prohibited Conduct

Other prohibited conduct means forms of conduct based on sex prohibited by the College as set forth in this Section III (B) meeting the following requirements:

Jurisdiction – Other prohibited conduct applies when the alleged sexual conduct:

- Occurs on College premises or other property owned or controlled by the College;
- Occurs in the context of a College employment or education program or activity, regardless of location, including, but not limited to College-sponsored events and programs including study abroad, research, on-line and internship programs; or
- Occurs on premises or other property not owned or controlled by the College or outside the context of a College employment or education program or activity, where the impact of the conduct has the effect of interfering with a Community Member(s) equal access to the College’s employment or educational programs and/or activities.

Other Prohibited Conduct includes:

- **Conduct Outside Title IX Jurisdiction:** conduct that would otherwise be prohibited under Section III (A) (e.g., Quid Pro Quo Sexual Harassment, Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, and Stalking), but which must be dismissed under the Title IX Sexual Harassment Policy because they do not meet jurisdictional requirements.
- **Sexual Harassment:** defined as any unwelcome sexual advance, request for sexual favors, or other unwanted conduct of a sexual nature, whether verbal, non-verbal, graphic, physical, or otherwise, when:
 - Submission to or rejection of such conduct is either an explicit or implicit term or condition of an individual’s employment, academic standing, evaluation of academic work or advancement in an academic program, or is used as the basis for College decisions affecting the individual (often referred to as “quid pro quo” or “this for that” harassment); or

- Creates a hostile environment when the conduct has the purpose or effect of unreasonably interfering with an individual’s learning, working, or living environment, or limiting or depriving an individual of the ability to participate in or benefit from the College’s employment or educational programs and/or activities. Conduct must be sufficiently severe or pervasive to create an intimidating, threatening, abusive, humiliating, or sexually offensive learning, working, or living environment.³ A single incident of Prohibited Conduct can be sufficiently severe to support the existence of a hostile environment (for example, Sexual Assault or Sexual Exploitation).
- **Examples of conduct that may constitute Sexual Harassment include, but are not limited to:**
 - Unwelcome sexual advances, whether they involve physical touching or not;
 - Sexual innuendos, jokes, written or verbal references to sexual conduct, gossip regarding one’s sex life, commenting on an individual’s body, discussion or inquiry about an individual’s sexual orientation, sexual activity, deficiencies, or prowess;
 - Displaying or circulating sexually suggestive objects, pictures, videos, or cartoons, including via electronic communications;
 - Bullying or hazing based on sex or gender.
- **Sexual Exploitation:** occurs when a person takes non-consensual or abusive sexual advantage of another. Sexual exploitation includes the following activities:
 - Taking advantage of another person, or attempting to take advantage of another person, without that person’s consent. The following activities are prohibited under this provision:
 - Voyeurism or Peeping: Intentionally watching, videotaping, or recording an individual who is undressing, completely or partially naked, or engaging in sexual activity. This includes allowing others to observe such conduct.
 - Sexual Exhibitionism: Engaging in sexually explicit activity in public spaces, including online.
 - Displaying or distributing nude or sexually explicit images of another person without that person’s consent.

³ Title IX does not reach curriculum or in any way prohibit or abridge the use of particular textbooks or curricular materials. See 28 C.F.R. § 54.455; 34 C.F.R. § 106.42. Furthermore, OCR’s 2001 *Guidance* stated that “Title IX is intended to protect students from sex discrimination, not to regulate content of speech... [T]he offensiveness of a particular expression as perceived by some students, standing alone, is not a legally sufficient basis to establish a sexually hostile environment under Title IX.” Department of Education, Office for Civil Rights, *Revised Sexual Harassment Guidance* (2001) at 22. See also OCR Dear Colleague Letter on the First Amendment, July 28, 2003 (explaining that “OCR’s regulations should not be interpreted in ways that would lead to the suppression of protected speech on public or private campuses.”).

- Writing or marking of graffiti on College property that is sexually graphic in nature.
- Prostituting another person or soliciting a prostitute to campus, or a campus event, to engage in prostitution.
- Knowingly exposing another person to a sexually transmitted infection or virus without that person's knowledge.
- **Inducing Incapacitation:** providing alcohol or drugs to an individual, with or without the individual's knowledge, with the purpose or intent of taking advantage of that individual's impairment or intoxication in furtherance of any conduct prohibited under this Policy.
- **Aiding or Facilitating:** Aiding or facilitating Sexual Misconduct means promoting or encouraging the commission of any behavior prohibited under this Policy. Community Members are prohibited both from personally engaging in Sexual Misconduct, and also from engaging in conduct which assists or encourages another person or persons to engage in such conduct (for example, acting as a lookout or inciting another to engage in prohibited conduct).
- **Attempted Violations:** The College will treat attempts to commit any of the conduct prohibited by this Policy as if those attempts had been completed.

C. Retaliation

Retaliation against an individual for making a report or complaint of sexual harassment, or for participating or refusing to participate in any proceeding regarding such a complaint, or for opposing discriminatory practices is prohibited under this Policy. Retaliation can be committed by any individual or group of individuals, not just those involved in a report or complaint.

Retaliation may include, but is not limited to, threats, coercion, verbal abuse, violence, and harassment, including knowingly making false statements about another person verbally or in writing. Retaliation will violate this Policy even where the underlying allegation(s) of Sexual Misconduct are dismissed or a finding of "no responsibility" has been made.

Complaints alleging retaliation under this Policy, including for the exercise of rights under this Policy, must be filed as a formal complaint in accordance with the procedures set forth in this Policy.

The College may take disciplinary action against an individual for making a materially false statement in bad faith in the course of an investigation, proceeding, or hearing under this Policy. However, the College will not conclude that a materially false statement was made in bad faith solely based on a determination regarding responsibility in connection with an adjudication under this Policy. Nothing in this Policy shall be construed to abridge academic freedom and inquiry, principles of free speech, or the College's educational mission. Community members remain free to share their own experience,

except information that they learned solely from the Sexual Misconduct Grievance Process. Individuals are not restricted in their ability to discuss allegations that are subject to the Grievance Process, except in a manner that constitutes retaliation.

III. CONSENT

A. Definition

B. Incapacity

A person who is incapacitated is unable, temporarily or permanently, to give Consent because she or he lacks the ability to make informed, rational judgments about whether or not to engage in sexual activity as a result of mental or physical helplessness, sleep, unconsciousness, or lack of awareness that sexual activity is taking place.

Mental helplessness means a person who is incapable of appraising or controlling their own conduct. Physical helplessness means a person who is physically unable to communicate one's willingness or unwillingness to engage in an act. A person may be incapacitated as a result of the voluntary or involuntary consumption of alcohol or other drugs, or due to a temporary or permanent physical or mental health condition.

A person is not necessarily incapacitated merely as a result of ingesting alcohol or other drugs. Incapacitation is an extreme form of intoxication. The impact of alcohol and other drugs varies from person to person. A person's level of intoxication can change rapidly, and incapacitation can be reached within a short period of time. Although every individual may manifest signs of incapacitation differently, typical signs include, but are not limited to, slurred or incomprehensible speech, unsteady gait, combativeness, emotional volatility, vomiting, outrageous or unusual behavior, and/or unconsciousness.

C. Consent Cannot Be Obtained by Force

Consent cannot be obtained by **Force**. Force includes the use of physical violence, threats, intimidation, and/or coercion.

Physical violence means that a person is exerting control over another person through the use of physical force. Examples of physical violence include hitting, punching, slapping, kicking, pushing, restraining, choking, and brandishing or using any weapon.

Threats are words or actions that would compel a reasonable person to engage in unwanted sexual activity. Examples include threats to harm a person physically, to reveal private information to harm a person's reputation or cause a person academic or economic harm.

Intimidation is an implied threat that menaces or causes reasonable fear in another person. A person's size, alone, does not constitute intimidation; however, a person's size may be used in a way that constitutes intimidation (e.g., blocking access to an exit).

Coercion is the use of an unreasonable amount of pressure to gain sexual access. Coercion is more than an effort to persuade, entice, or attract another person to have sex.

When a person makes clear a decision not to participate in a particular sexual activity or a form of sexual activity, a decision to stop, or a decision not to go beyond a certain sexual interaction, continued pressure can be coercive. To constitute coercion, conduct must impair the other individual's freedom of will to participate in sexual activity.

In evaluating whether Consent existed, consideration will be given to the totality of the circumstances including, but not limited to, the extent to which the words or clear, unambiguous actions of the alleged victim affirmatively communicated their willingness to participate in sexual activity; whether a reasonable sober person in the position of the individual alleged to have engaged in the prohibited conduct would have known or should have known that the alleged victim was incapacitated; and whether the circumstances indicate that Consent to sexual activity did not exist.

IV. REPORTING AND CONFIDENTIALITY

The following information is provided to help Community Members make informed choices about where to turn if they or someone else is a victim of Sexual Misconduct. The College encourages victims to talk to someone about what happened so that they can get the care and support they may need, and so the College can take prompt action to respond to the issue.

The College is committed to protecting the privacy of all involved in the response to a report of Sexual Misconduct in accordance with applicable law, and will take steps to limit disclosure of related information only to those individuals who have a need to know in order to assess the report, provide supportive measures, and to take steps to eliminate conduct that violates this Policy, prevent its recurrence, and remedy its effects.

The privacy of Student education records will be protected in accordance with the Family Educational Rights and Privacy Act (FERPA). The privacy of an individual's medical and related records is generally protected by the Health Insurance Portability and Accountability Act (HIPAA), excepting health and treatment records protected by FERPA.

A. Employee Confidentiality and Reporting Obligations

It is important to understand that each Employee's obligations with respect to maintaining confidentiality and reporting disclosures concerning Sexual Misconduct will depend on whether the Employee is considered to be a "Confidential Employee." Only Confidential Employees are exempted from the requirement for employees to report information concerning incidents of Sexual Misconduct to the Coordinator. Confidential Employees are the College Counselors, Campus Chaplain and Campus Deacon.

All Employees including faculty, staff, administrators, and students employed as resident assistants, and graduate assistants who are not identified as being a Confidential Employee as defined herein, are required to immediately report all information obtained, whether directly or indirectly, about incidents of Sexual Misconduct to the Coordinator including the names, if known, of the victim and all others involved in, or having knowledge of the incident.

Reporting allows the Coordinator to provide support services and information concerning reporting and resolution options and procedures to individuals who may have been subjected to Sexual Misconduct and to evaluate patterns, trends, and safety issues for the Community at-large.

Confidential Employees: A victim of Sexual Misconduct can seek assistance and support from a Confidential Employee without triggering a report of information concerning such conduct to the Coordinator or to the College that could reveal the victim's identity or that the victim disclosed the incident.

The College has designated individuals who are employed in positions that provide medical care, mental health services, and counseling, as well as employees providing such services under their supervision, as being Confidential Employees. A listing of confidential positions is included at Appendix C.

The designation of Confidential Employee status extends to employees working in positions that provide administrative and/or related support to Confidential Employees in connection with their provision of confidential services. However, the designation extends only to information received or learned by such employees in the course of performing their job duties in support of the Confidential Employee(s).

Confidential Employees are instructed to inform individuals who may have been subjected to Sexual Misconduct of their right to make a report and to file a Complaint with the College, however, Confidential Employees are not required to disclose to the College any personal or other information that could reveal the identity of a victim of Sexual Misconduct who disclosed information to the Confidential Employee in connection with their provision of confidential services to the victim.

While Confidential Employees may maintain a victim's confidentiality with respect to the College, they may disclose personally identifiable information as required by law or a court order. For example, such information may be disclosed when: (i) the victim gives written consent for disclosure; (ii) there is an imminent threat of harm to the individual or others; or (iii) the information concerns conduct involving suspected abuse or neglect of a minor under the age of 18.

V. CONFIDENTIAL AND NON-CONFIDENTIAL SUPPORT AND ASSISTANCE

The College offers a wide range of resources to provide Community Members with care, support and guidance in response to incidents of Sexual Misconduct. The College strongly encourages community members who have been subjected to Sexual Misconduct to seek care and support from confidential and/or non-confidential resources available to them on or off campus.

A. On-Campus Resources

A listing of on-campus confidential and non-confidential resources, including contact information, that can provide Community Members with emergency and ongoing medical treatment, counseling, support, victim advocacy services, and options for reporting incidents to the College and/or law enforcement is included at [Appendix C](#)

B. Off-Campus Resources

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the College unless the victim authorizes the disclosure.

Information concerning some of the resources available in the Worcester community including hospitals, counseling, advocates, law enforcement agencies, and legal services is included in [Appendix D](#).

VI. SUPPORTIVE MEASURES

The Coordinator is responsible for the implementation of supportive measures and for coordinating with other College officials and departments to do so. Upon receipt of a report or formal complaint of a violation of this Policy, the College, through the Coordinator, will promptly contact the complainant, or if unknown attempt to identify the complainant, to discuss the availability of supportive measures. Where a formal complaint has been made, the Coordinator will contact the respondent to discuss the availability of supportive measures.

Supportive measures are non-punitive measures designed to restore or preserve equal access to the College's educational and employment programs or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties and the broader College community, or deter Sexual Misconduct. The approval and application of supportive measures will be determined by the specific circumstances of each case.

The Coordinator shall consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint. The College will also consider supportive measures, as appropriate and reasonably available, for the respondent and for third parties, taking into account the role of the third party and the nature of their relationship to the College.

Supportive measure may impose restrictions on a party however, supportive measures will not be applied to impose an unreasonably burden. The College may provide supportive measures to the complainant or respondent, as appropriate, as reasonably available, and will do so without fee or charge, regardless of whether the complainant seeks formal disciplinary action.

Once supportive measures are approved, the parties and/or affected individuals will be notified in writing of the supportive measures. The College will keep supportive measures provided to a party confidential to the extent practicable.

For information and assistance in arranging supportive measures, individuals may contact the Title IX Coordinator or a Deputy Coordinator.

Title IX Coordinator	Corina Hendea, Director of Human Resources, Socquet House, CHendea@annamaria.edu, 508-849-3444.
Deputy Title IX Coordinator	Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall, jeckstrom@annamaria.edu, 508-849-3271

Examples of supportive measures include:

- Issuing mutual no-contact orders (i.e., an order directing one or both of the parties to refrain from contacting the other, directly or through proxies);
- Placing a non-student Employee on administrative leave from employment during the pendency of investigation and resolution proceedings.
- Arranging access to counseling services and assistance in setting up initial appointments for students, or providing contact information for available counseling services for employees;
- Assistance in seeking academic assistance or modifications;
- Assistance in modifying College housing arrangements, if available;
- Assistance in modifying College employment arrangements, including changes in work schedules, job assignments, or work locations;
- Changing an Employee’s phone number at work;
- Arranging a meeting with Police to discuss safety planning, the filing of a criminal complaint or request for a protective order;
- Arranging a leave of absence.

VII. REPORTING SEXUAL MISCONDUCT

The College strongly encourages anyone (students, employees, faculty, visitors or others) who experience, witness, or becomes aware of any incident of Sexual Misconduct, regardless of location, to report such conduct immediately.

The College prohibits retaliation against anyone who reports incident of sexual misconduct, assist another in making a report, or who participates in investigation of a report or the College’s grievance procedures in response to a formal complaint.

The College provides multiple avenues for reporting incidents of Sexual Misconduct. Individuals may choose to make a report to the College under this Policy, either directly or anonymously, to law enforcement for potential criminal prosecution, or to both or

neither. Additionally, Individuals can choose to pursue civil legal action and/or to seek protective orders from a court of law with or without making a report to the College or law enforcement.

Complaints made to the College, law enforcement and/or civil courts can be pursued concurrently under the College's grievance procedures and external civil and/or criminal processes.

A. Filing a Complaint with Law Enforcement

A Complainant has the right to notify or decline to notify law enforcement concerning an incident of Sexual Misconduct. A Complainant who wishes to pursue criminal action in addition to, or instead of, making a report to the College is strongly encouraged to immediately notify law enforcement directly by contacting:

Campus Police Department

Paxton Public Safety
publicsafety@annamaria.edu
(508) 494-9010
Emergency 911

Public Safety Officers are available 24 hours a day, seven days a week.

Worcester County District Attorney's Office

Child Abuse & Sexual Assault Unit
255 Main Street, Worcester
(508) 755-8601

Police have the power to seek and execute search warrants, collect forensic evidence, make arrests, and assist in obtaining civil protective orders. Campus Police and/or the Title IX Coordinator can provide support and arrange transportation for a Community Member who wishes to seek the assistance of off-campus law enforcement authorities concerning incidents of Sexual Misconduct. Under limited circumstances, posing a threat to health or safety of a Community Member, the College may independently notify law enforcement of the incident(s).

Individuals may inform law enforcement authorities about Sexual Misconduct and discuss the matter with a law enforcement officer without making a formal criminal complaint or a formal complaint to the College. Individuals who make a criminal complaint may also choose to pursue a formal complaint with the College simultaneously.

A criminal investigation into the matter will not preclude the College from conducting its investigation of a formal complaint. However, the College may temporarily delay its investigation while criminal investigators are gathering evidence. Although the investigations complaints may be conducted simultaneously, they will be independent of one another. The College may obtain and use reports and information developed in the

course of a law enforcement investigation in the College’s investigation and resolution of a Complaint of Sexual Misconduct.

A criminal investigation into the matter does not preclude the College from conducting its investigation of a formal complaint. However, the College may temporarily delay its investigation while criminal investigators are gathering evidence. Although investigations under College and law enforcement procedures can be conducted simultaneously, they will be independent of one another. The College may obtain and use reports and information developed in the course of a law enforcement investigation in the College’s investigation and resolution of a Complaint of Sexual Misconduct.

Neither the results of a criminal investigation nor the decision of law enforcement to investigate or decline to investigate the matter is determinative of whether Sexual Misconduct, for the purposes of this Policy, has occurred.

Protective Orders

Any community member who obtains a protective order from a court must provide a copy of the order to the College’s Title IX Coordinator. This will provide the College with knowledge of the Order and the requisite restriction and will enable the College to put supportive and/or other measures as may be needed in connection with the Order.

B. Reporting to the College

The College strongly encourages anyone who has experienced, has knowledge of, or has witnessed Sexual Misconduct to make a report to the College. Making a report to the College does not require participation in any subsequent College proceedings, nor is a report required in order for an individual to receive support or remedial measures.

Note: All of the following, including employees of the identified offices and departments, are employees required to immediately report all information (obtained directly or indirectly) about incidents of Sexual Misconduct involving a Community Member to the Title IX Coordinator. They must also report information as required under the Clery Act.

Reports of sexual misconduct can be made to the College by contacting any of the following:

The College Title IX/Sexual Misconduct Coordinator and Deputy Coordinators
Reports and formal complaints can be submitted to the Coordinators 24 hours a day, seven days a week via email to: **CHendea@annamaria.edu**

The Coordinators can also be contacted during business hours (8:30 a.m. to 4:30 p.m., Monday through Friday) in person, via email or telephone using the following contact information:

Title IX Coordinator	Corina Hendea, Director of Human Resources, Socquet House, CHendea@annamaria.edu, 508-849-3444.
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Deputy Title IX Coordinator	Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall, jeckstrom@annamaria.edu, 508-849-3271
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Campus Police Department

Foundress Hall West
publicsafety@annamaria.edu
508-494-9010

Campus Police Officers are available 24 hours a day, seven days a week.

Student Affairs Office

Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall,
jeckstrom@annamaria.edu, 508-849-3271
Office staff are available during business hours (8:30 a.m. to 4:30 p.m., Monday through Friday).

Human Resources Corina Hendea, Director of Human Resources, Socquet House,
Chendea@annamaria.edu, 508-849-3444.

Human Resources staff are available during business hours (8:30 a.m. to 4:30 p.m., Monday through Friday).

C. Anonymous Reporting Options

Anonymous reports may be made in writing to the Coordinator via mail, by email to chendea@annamaria.edu If a party chooses to email an anonymous report the party should ensure the email is sent from an address which is not obviously connected to the party or by calling (508) 849-3444.

A formal complaint cannot be made anonymously

Individuals who choose to file anonymous reports of Sexual Misconduct are advised that the College will conduct an inquiry into the report. However, the College’s ability to conduct an effective inquiry and to take action concerning the report may be significantly limited. Anonymous reports may be used for Clery Act data collection purposes.

Employees cannot make anonymous reports concerning information (obtained directly or indirectly) about incidents of Sexual Misconduct involving a Community Member. Employees must report all such information to the Title IX Coordinator.

D. Classroom Discussions and Public Awareness Events

Classroom discussions and assignments as well as public awareness events such as “Take Back the Night,” candlelight vigils, protests, survivor speak outs, film screenings, or other public forums in which incidents of Sexual Misconduct are disclosed shall not be

considered to place the College on notice of an incident of Sexual Misconduct for purposes of triggering its obligation to investigate any particular incident(s).

E. Clery Act Reporting

Pursuant to the Clery Act, the College includes statistics about certain offenses in its daily crime log and annual security report and provides those statistics to the United States Department of Education, but does so in a manner that does not include any personally identifying information about persons involved in an incident. If a report of Sexual Misconduct discloses a serious and continuing threat to the College community, where timely notice must be given to protect the health or safety of the community, the College is required to issue a timely notification to the community under the Clery Act. The timely warning will not provide any personally identifying information about the victim.

F. Limited Immunity for Conduct Violations

The College considers the reporting and resolution of Sexual Misconduct violations to be of paramount importance. Accordingly, students who in good faith make a report of sexual misconduct or who, in good faith, provide information to the College as a witness in connection with the investigation and resolution of a report or formal complaint of alleged Sexual Misconduct will not be subject to disciplinary sanctions for violations of student conduct policies related to the underlying incident of alleged sexual misconduct unless the conduct violations were egregious. An egregious violation shall include, but not be limited to, taking an action that places the health and safety of another person at risk.

VIII. PROCEDURES FOR RESPONDING TO REPORTS AND FORMAL COMPLAINTS

These procedures outline the steps the College will take upon receiving a report or formal complaint of alleged Sexual Misconduct.

In order to protect the safety of the campus community, the Coordinator may review reports of alleged violations of this Policy even when a formal complaint has not been filed or has been withdrawn to determine if an investigation may be warranted. In such cases, the Coordinator may determine to file a formal complaint and proceed with an investigation even if a complainant has requested that the College take no action on the matter.

In making a determination to file a formal complaint, the Coordinator will consider the complainant's request, the College's obligations to address sexual misconduct, safety concerns, the interests of others involved, and the interests of the College community.

A. Supportive Measures

The Coordinator is responsible for the implementation of supportive measures and for coordinating with other College officials and departments to do so. Upon receipt of a report or formal complaint of a violation of this Policy, the College, through the

Coordinator, will promptly contact the complainant, or if unknown attempt to identify the complainant, to discuss the availability of supportive measures.

The Coordinator will also discuss the availability of supportive measures with the Respondent, as appropriate, with third parties taking into account the role of the third party and the nature of their relationship to the College.

Supportive measures are designed to restore or preserve equal access to the College's educational and employment programs or activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties and the broader College community, or deter Sexual Misconduct. The approval and application of supportive measures will be determined by the specific circumstances of each case.

The Coordinator shall consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint, grievance procedure, and the process for resolving formal complaints including informal resolution, if available and deemed appropriate by the Coordinator.

Supportive measure may impose restrictions on a party however, supportive measures will not be applied so as to impose an unreasonably burden. The College may provide supportive measures to the complainant or respondent, as appropriate and reasonably available, and will do so without fee or charge, regardless of whether the complainant seeks formal disciplinary action.

Once supportive measures are approved, the parties and/or affected individuals will be notified in writing of the supportive measures. The College will keep supportive measures provided to a party confidential to the extent practicable.

For information and assistance in arranging supportive measures, individuals may contact the Title IX Coordinator or a Deputy Coordinator.

Title IX Coordinator	Corina Hendea, Director of Human Resources, Socquet House, CHendea@annamaria.edu, 508-849-3444.
Deputy Title IX Coordinator	Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall, jeckstrom@annamaria.edu, 508-849-3271

Examples of supportive measures include:

- Issuing mutual no-contact orders (i.e., an order directing one or both of the parties to refrain from contacting the other, directly or through proxies);
- Placing a non-student Employee on administrative leave from employment during the pendency of investigation and resolution proceedings.

- Arranging access to counseling services and assistance in setting up initial appointments for students, or providing contact information for available counseling services for employees;
- Assistance in seeking academic assistance or modifications;
- Assistance in modifying College housing arrangements, if available;
- Assistance in modifying College employment arrangements, including changes in work schedules, job assignments, or work locations;
- Changing an Employee's phone number at work;
- Arranging a meeting with Police to discuss safety planning, the filing of a criminal complaint or request for a protective order;
- Arranging a leave of absence.

B. Emergency Removal / Administrative Leave

In connection with this Policy, whether or not a grievance process is underway, the College may summarily remove a student from an educational programs and/or activities on an emergency basis, after undertaking an individualized safety and risk analysis, and upon the determination that the individual poses an immediate threat to the physical health or safety of any student or other individual (including themselves, the respondent, the complainant, or any other individual). In these situations, the College will provide the individual with notice and an opportunity to challenge the decision immediately following removal.

The College may place an employee who is named as a Respondent in a formal complaint under this Policy on administrative leave for all or any part of the investigation and resolution proceedings. However, leave will be administered in a manner that will allow the employee an equal opportunity to participate in the proceedings.

C. Initial Assessment and Determination of Covered Conduct

Where the complainant is known or identified, the Coordinator will arrange a meeting to discuss the report or formal complaint with the complainant and the procedures and actions available under this Policy to resolve the complaint.

The actions of the Coordinator in conducting the initial assessment will include, but are not limited to, the following:

- Inform complainant about how to access a copy of the Sexual Misconduct Policy.
- Provide complainant with information about confidential and non-confidential medical, wellness, and support resources on-campus and off-campus.
- Explain the importance of obtaining and preserving forensic and other evidence, and their right to contact law enforcement, or to decline to contact law enforcement, and/or to seek a protective order.

- Inform complainant of the prohibition of retaliation against individuals who make a report or formal complaint, or who participate in the grievance and resolution procedures under this Policy.
- Assess the nature and circumstances of the report and determine if the reported conduct demonstrates a threat to the health or safety of the College community that may warrant issuance of a timely warning or entry of the report in the daily crime log.
- Make a determination as to whether the conduct reported would, if substantiated, constitute conduct prohibited under this Policy.
- If the Coordinator determines that the conduct reported would, if substantiated, constitute conduct prohibited under this Policy, the complaint may move forward. If not, the complaint will be dismissed. If applicable, the complaint may be referred for action under other applicable College policies.
- If a formal complaint has not been made, the Coordinator will discuss the process for making a formal complaint with the complainant and the procedures and actions available under this Policy to resolve the complaint.
- Discuss any concerns or barriers to complainant's participation in any investigation or resolution procedures under this Policy and explain the College's policies concerning retaliation, privacy and confidentiality with respect to such procedures.
- Discuss the Complainant's preferred resolution for the complaint.
- If the complainant does not file a formal complaint or chooses not to go forward with a formal complaint, the Coordinator may review the matter to determine whether to file a formal complaint and proceed with an investigation even if complainant has requested that the College take no action.

IX. Informal Resolution Process

Subject to the consent of the parties and the approval of the Coordinator, the College may permit a formal complaint to be resolved through informal resolution. Informal resolution is available for cases under this policy except those involving allegations that an employee has subjected a student to prohibited conduct.

The informal resolution process is a voluntary, meditation based process designed to provide parties with an option to reach an agreement to resolve the complaint through mediation outside of the College's formal grievance processes under the Policy. The mediation will be facilitated by an individual selected by the College.

In order to use the informal resolution process, both parties must provide voluntary, written consent to the informal resolution process and must receive written notice disclosing: the allegations, the requirements of the informal resolution process (including

the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations), and any outcomes resulting from participating in the informal resolution process (including the records that will be maintained or could be shared).

At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint. Likewise, the College may end the informal resolution process any time prior to the parties reaching agreement on a resolution. A resolution shall not be agreed unless and until it is reduced to writing, reviewed by the Coordinator for compliance with the purposes and procedures of this policy, and signed by each party.

If the informal resolution process is terminated prior to an agreement on resolution, information relevant to the adjudication of the Complaint may be reviewed and considered by the investigator and included in the investigation report for consideration in the adjudication process.

The College will not require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to an investigation and adjudication of formal complaints of College Sexual Misconduct. Similarly, the College will not require, encourage, or discourage the parties from participating in the informal resolution process. The College will not offer the informal resolution process unless a formal complaint is filed and the Coordinator approves the use of the process for the resolution of the Complaint.

The parties may submit a request to the Coordinator for approval to use the informal resolution any time after the filing of a formal complaint up to 48 hours prior to the scheduled start of an adjudicatory hearing under this Policy.

X. Sexual Misconduct Grievance Process – Investigation and Adjudication

The College is committed to providing a prompt, fair, and impartial investigation and adjudication of all formal complaints alleging violations of this Policy. During the grievance process, both parties (complainant and respondent) will have equal rights to participate.

The Coordinator is responsible for overseeing the investigation and resolution of formal complaints, and will be the primary point of contact for complainant and respondents(s) throughout the grievance process. This process will result in the resolution of formal complaints through investigation, adjudication, or dismissal.

Individuals conducting proceedings under the grievance process will receive annual training on issues related to Sexual Misconduct, investigation procedures, and hearing procedures. The College will not disclose the identity of the parties, except as necessary to carry out grievance procedures or as may be permitted or required under state or federal law.

Presumption of Good Faith Reporting: The College presumes that reports of prohibited conduct are made in good faith. A finding that the alleged behavior does not constitute a violation of this Policy or that there is insufficient evidence to establish that the alleged conduct occurred as reported does not mean that the report was made in bad faith.

Presumption of Non-Responsibility: The respondent is presumed to be not responsible for the alleged conduct unless and until a determination regarding responsibility is made at the conclusion of the grievance process.

Notices and Communications: Unless the Coordinator gives written direction otherwise, all notices and other communications made by the College in connection with these procedures shall be deemed to have been delivered to a participant (Complainant, Respondent, witness, etc.) when sent electronically to the participant's College issued email account.

Time Period: The College will endeavor to complete the investigation and adjudication of formal complaints within ninety (90) business days from the date of the after the investigators' first interview of the complainant. Timeframes for all phases of the grievance process, including the investigation, the hearing, and any related appeals, apply equally to both parties.

There may be circumstances that require the extension of time frames for good cause. The Coordinator may extend time frames to ensure the integrity and completeness of the investigation or adjudication, comply with a request by external law enforcement, accommodate the absence of a party, adviser, or witness, or for other legitimate reasons, including the complexity of the investigation and the severity and extent of the alleged misconduct. The College will notify the parties in writing of any extension of the time frames for good cause, and the reason for the extension.

Standard of Evidence: All determinations concerning responsibility for violations of the Sexual Misconduct Policy will be made using a preponderance of the evidence standard. Preponderance of the evidence means that, based on the evidence, it is more likely than not that the Respondent engaged in prohibited conduct as defined in the Sexual Misconduct Policy.

Cooperation: All Community Members involved in the investigation and resolution of Complaints are expected to cooperate with the Coordinator, Investigator and others with responsibility for implementation of these procedures. All Community Members participating as a Complainant, Respondent or witness under this Policy are expected to do so honestly. Individuals who make knowingly false or intentionally misleading statements in connection with any part of the process may be subject to disciplinary action.

Conflict of Interest/Bias: All individuals involved in the administration of the grievance process must be free of conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent and be trained as required pursuant to Title IX regulations. Parties will be notified at the appropriate

junctures of the identities of the individuals serving as investigators, hearing panel members, and appeal officers.

A party who has concerns that one or more of the individuals assigned to perform the duties of one of these positions has a conflict of interest or is biased must report their concerns in writing to the Coordinator within 48 hours of being notified of their appointment to explain the basis for the claimed conflict or bias. The Coordinator will review the allegations of conflict or bias and will determine if the individual(s) identified can fulfill their duties impartially. If not, the Coordinator will replace the individual(s).

Confidentiality: While complainants, respondents, and witnesses involved in the grievance process under this Policy are strongly encouraged to exercise discretion in sharing information in order to safeguard the integrity of the process and to avoid the appearance of retaliation, complainants and respondents are not restricted from discussing the allegations under investigation.

Medical, psychological, and similar treatment records are privileged and confidential documents that cannot be accessed or used for a grievance process under this Policy without the relevant party's voluntary, written consent.

Advisors: Throughout the investigation and resolution process, the complainant and respondent have the right to be accompanied by an advisor of their choice during any College disciplinary proceeding, including any related meeting, interview, or hearing, held pursuant to the Sexual Misconduct Policy ("Proceeding"). An advisor may be any person, including an attorney. Complainant and respondent need not use the same advisor throughout the investigation and resolution process. However, he or she may only have a single advisor present during any Proceeding.

Advisors may not participate actively or speak for the individual he or she is advising in any Proceeding other than an adjudicatory hearing, although they may ask for brief breaks during meetings, interviews, or hearings to consult privately with the individual they are present to advise. The Advisor will conduct cross-examination of the opposing party during the adjudicatory hearing. If a party does not have an advisor for a scheduled adjudicatory hearing, they must notify the Coordinator and the College will provide an advisor for them for the hearing.

Advisors are subject to the same confidentiality expectations applicable to others in attendance. Accommodations, including scheduling of interviews or hearings, will not be made for any advisors if such will unduly delay the process. The College official presiding over a Proceeding may terminate the participation of an advisor who is disruptive or otherwise fails or refuses to comply with the College's rules and/or policies with respect to the Proceeding.

Past History: In general, information concerning either party's sexual history beyond the conduct forming the basis of the Complaint, will not be solicited or considered as part of the investigation and resolution process. However, where Consent is at issue and the parties have previously engaged in consensual sexual relations, the prior consensual sexual history between them including the manner and nature of communications

between them, may be relevant to the assessment of issues concerning Consent, or to the identity of the Respondent, if in question. However, the fact that the parties had engaged in previous consensual sexual relations, is not sufficient to establish Consent to subsequent sexual activity, and there must be Consent for all sexual activity.

Information concerning incidents of similar conduct or acts of violence on the part of the Respondent prior or subsequent to the conduct raised in the Complaint, whether or not the subject of another Complaint or finding of responsibility, may be deemed relevant to the assessment of responsibility for conduct alleged in a complaint, if such information indicates a history of conduct related to the conduct alleged in the complaint.

Consolidation: The Coordinator has the discretion to consolidate multiple formal complaints of allegations of violations of the Sexual Misconduct Policy against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of arise out of the same facts or circumstances.

Failure or Refusal to Participate: The failure or refusal of a Complainant or Respondent to participate in any investigation or resolution proceedings will not prevent the College from moving forward with the investigation and adjudication process. If after appropriate notice is given, a party fails or refuses to participate in any such proceeding, the College shall continue the process and will make its determinations based on the information available.

The College will not take disciplinary or other adverse action against a party for choosing not to participate in the proceeding, refusal to answer questions, or to be cross-examined(s) at a hearing. Further, no adverse inference shall arise or be applied in making any decision or determination concerning a party based solely on the individual's absence from the proceeding, refusal to answer a question, or to be cross-examined at a hearing.

If a party or a witness fails to appear at an adjudicatory hearing or refuses to be cross-examined, the Hearing Officer or Panel may not, rely on any statement provided by that non-participating individual in reaching a determination regarding responsibility; or draw any adverse inference from same.

A. Investigation

If the Coordinator has determined, following an initial assessment, that an investigation is appropriate, they will refer the matter for investigation and will appoint an investigator. If needed, the investigator may be assisted in conducting investigation functions by other qualified individuals.

Notice of Investigation

Following the receipt and review of the formal complaint by the Coordinator, and it being determined that the matter properly falls under this Policy the parties will be informed in writing of the initiation of the investigation. The written information shall include:

- The identities of the parties, if known.
- A concise summary of the alleged conduct at issue (including when and where it occurred, including the date, time and location, if known).
- A statement of which policies were allegedly violated and by what actions.
- Notice of the allegations potentially constituting sexual misconduct.
- A statement that the respondent is presumed not responsible and that a determination regarding responsibility is made at the conclusion of the grievance process.
- A statement informing the parties that they may have an adviser of their choice, who may be, but is not required to be, an attorney.
- A statement informing the parties that they may request to inspect and review evidence.
- A statement informing the parties that knowingly making false statements or knowingly submitting false information during the grievance process may constitute a violation of College policy.
- Information regarding the applicable grievance procedures, including the informal resolution process.
- Notice of the individual appointed to conduct the investigation, including the individual's name and business address.
- If, during the investigation, additional information is disclosed that may also constitute prohibited conduct under this policy, the respondent and complainant will be informed in writing that such additional information will be included in the grievance process.

Collection of Evidence

The investigator(s) will collect information from each party. While the complainant and the respondent are not restricted from gathering and presenting relevant evidence, the investigators are responsible for gathering relevant evidence to the extent reasonably possible. However, each party will be given an equal opportunity to suggest witnesses; provide other relevant information, such as documents, communications, photographs, and other evidence; and to submit a written statement concerning the allegations in the formal complaint.

Parties and witnesses are expected to provide all available relevant evidence to the investigator(s) during the investigation. While parties are not restricted from presenting information attesting to the parties' character, such evidence generally is not considered relevant.

The investigator(s) will provide to a party written notice of the date, time, location, participants, and purpose of all investigative interviews to which they are invited or expected, with sufficient time (generally no less than three (3) business days, absent exigent circumstances) for the party to prepare to participate.

Parties will be interviewed separately and will be interviewed by the panel of investigators. The investigators will interview witnesses as necessary and may, at their discretion, delegate witness interviews to two investigators. The investigators will record all interviews, or notes of the interviews will be taken by the investigators. Any other recording of interviews is prohibited and violations may result in discipline.

In general, a party's medical and counseling records are confidential. The investigators will not access, consider, disclose, or otherwise use a party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the party, unless the investigators obtain that party's voluntary, written consent to do so.

The investigator(s) will not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege (e.g., attorney-client, doctor-patient), unless the individual holding such privilege has waived the privilege.

Case File

After investigator(s) have completed any witness interviews and gathering of evidence, the investigator(s) will prepare a case file. The case file will include all collected evidence that is directly related to the allegations raised in the formal complaint, including the evidence upon which the College does not intend to rely in reaching a determination regarding responsibility and including any inculpatory or exculpatory evidence, whether obtained from a party or other source as part of the investigation.

The case file may include, as applicable, summaries of party and witness interviews and other collected documents and evidence. The investigator(s) will provide the case file (or, when deemed appropriate, a written summary of relevant information contained in the case file), redacted of personally identifiable information in accordance with privacy regulations, to each party and their adviser in electronic form or hard copy. In all cases, any information relied on in adjudicating the matter will be provided to the parties and their advisors. The investigator(s) will also provide an updated Notice of the Allegations, as appropriate.

Within ten (10) business days of receiving the case file (or written summary, as applicable), each party may submit a response in writing, which may include a request that the investigators collect additional evidence. If the investigator(s) believe that further information is needed following receipt of any responses from the parties, the investigator(s) will pursue additional investigative steps as needed. The parties and their advisors will be provided with each party's written responses to the case file, if any, as

well as any additional information collected by the investigators (or a written summary of same, as applicable), in electronic format or hard copy.

Investigation Report

Following their review of the parties' responses (if any) to the case file (or written summary, as applicable), the investigator(s) will create a written investigative report that summarizes all relevant evidence; the report will not contain irrelevant information. The report should include a statement of the allegations, a description of the events in question, information concerning the scope and conduct of the investigation, and summaries of interviews conducted and relevant evidence developed (for example, documents, photographs, electronic records, police reports, text messages, statements, and other relevant materials). The report may include the investigator(s) observations with respect to the demeanor and participation of the parties and witnesses, relevant consistencies and inconsistencies in the information provided, and issues, if any, concerning the credibility of information submitted by parties and witnesses.

At least ten (10) business days prior to the hearing, the investigative report (or a written summary of same, as applicable) will be provided to the parties and their advisors via electronic format.

The parties may choose to provide a written response to the investigative report, which must be submitted at least five (5) business days prior to the start of the hearing. The response may consist of a written statement not to exceed five (5) double spaced pages. At least 48 hours prior to the hearing, the parties and their advisors will be provided with the other party's written response to the investigative report, if any, in electronic format.

B. Hearing

The Coordinator appoints four individuals to act as a Hearings Panel and will designate one of the individuals selected to act as the Chairperson of the Hearings Panel. The Hearings Panel will be comprised of three voting members and a non-voting Chairperson. Hearings will generally be conducted as a live hearing during which it assembles (in person or virtually) all of the parties together at the same time.

The Chairperson will have absolute discretion with respect to administering the hearing and shall decide whether evidence and witnesses are relevant or irrelevant, with the understanding that the introduction of relevant evidence and witnesses will always be permitted, and shall be responsible for maintaining an orderly, fair, and respectful hearing. The Chairperson will have broad authority to respond to disruptive or harassing behaviors, including adjourning the hearing or excluding the offending individual, including a party, witness, or advisor.

Prior to the hearing, the Hearing Panel will be provided with the case file (and written summaries, as applicable), investigative report, and any responses to the investigative report. Each member of the Hearing Panel shall review the case file (including the parties' responses), ask questions during the hearing as they deem appropriate, and participate in the deliberations leading to the adjudication of responsibility.

At least five (5) business days prior to the hearing, the parties and their advisors will be notified of the hearing date, time, and location (or relevant electronic information, if the hearing will be conducted remotely).

In advance of the hearing, parties will be given the opportunity to request that certain witnesses be called at the hearing. The Chairperson has discretion to exclude from the hearing evidence/witnesses/questions deemed irrelevant.

The Chairperson will schedule a time for a pre-hearing conference to advise each of the parties and their advisors concerning hearing protocol and rules. At the Chairpersons discretion, pre-hearing conferences may be held in-person or by telephone. Each party may make requests related to the format or the nature of their participation in the hearing. The Chairperson will accommodate requests by either party for the hearing to occur with the parties located in separate locations with technology enabling the Hearing Panel and the parties to simultaneously see and hear the party answering questions.

As appropriate and/or at the discretion of the Chairperson, hearings may be conducted in person or by video conference or any other means of communications by which all individuals participating are able to see and hear each other.

Presentation of the Case

A typical hearing may include brief opening remarks by the Chairperson; questions posed by the members of Hearing Panel to one or both of the parties and to any relevant witnesses; the opportunity for the parties Advisors to cross-examine the other party and relevant witnesses. Only relevant cross examination questions may be asked of a party or witness. The Chairperson has the sole discretion to determine what questions are relevant. The Hearings Panel will consider all relevant evidence.

Record of Hearing

The College shall create an official record in the form of a recording or transcript of any live (or remote) hearing and make it available to the parties for inspection and review. Any other record of the hearing or any other recording is prohibited and violations may result in discipline and/or appropriate legal action.

Written Determination

Following the hearing, the Hearing Panel will consider all of the relevant evidence and deliberate regarding responsibility. The members of the Hearing Panel shall deliberate and make a determination, by a preponderance of the evidence, whether the respondent has violated the policy by a majority vote.

The parties and their advisors will simultaneously be provided with written notice of the determination (or, when deemed appropriate, a written summary of the written determination) of the hearing and disciplinary sanctions, if applicable, no later than seven (7) business days after the final determination is made, unless good cause for additional time is shown.

The Chairperson shall generate a written determination, which will contain:

- the allegations potentially constituting prohibited Sexual Misconduct;
- a description of the procedural steps taken from the receipt of the formal complaint through the determination (including any notifications to the parties, interviews with parties and witnesses, site visits (if any), methods used to gather other information, and the hearing);
- findings of fact supporting the determination;
- conclusions regarding the application of this policy to the facts;
- a statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility (i.e., whether a policy violation occurred), any disciplinary sanctions imposed by the Sanction Officer if there has been a finding of responsibility.
- whether any remedies designed to restore or preserve equal access to the College's education program or activity or working environment will be implemented; and
- relevant appeal information for the parties.

Disciplinary sanctions and remedies will be determined in accordance with the procedures listed below, and the information will be provided to the Chairperson for inclusion in the written determination.

The parties and their advisors will simultaneously be provided with the written determination (or, when deemed appropriate, a written summary of the written determination) via electronic format.

C. Disciplinary Sanctions and Remedies

If a party is found to have violated this policy, before finalizing the written determination, the Chief Hearing Officer will refer the matter to the appropriate College official(s) to determine sanctions and remedies. Sanctions being imposed will be included in the written determination.

Sanctions will take into account the seriousness of the misconduct, the respondent's previous disciplinary history (if any), and institutional principles. Remedies, which may include supportive measures, will be designed to restore or preserve equal access to the College's education program or activity. Supportive measures applied as remedies following a finding of responsibility may be punitive in nature and place burdens on the Respondent.

When there is a finding of responsibility, the case record (consisting of the case file and responses, investigative report and responses, hearing recording, and written

determination relating to the finding of responsibility) will be provided to the appropriate Sanction Officer listed below, based on respondent's primary relationship to the College.

The Sanction Officer shall set the sanctions in consultation with appropriate College administrators:

- If an undergraduate student is found responsible for violating the policy, the Conduct Code Administrator will determine sanctions and remedies.
- If a graduate student is found responsible for violating the policy, the Conduct Code Administrator will determine sanctions and remedies.
- If a faculty member is found responsible, the case the Vice President for Academic Affairs will determine sanctions and remedies.
- If a staff member is found responsible, the Director of Human Resources will determine sanctions and remedies.

In the event that any of the Sanction Officers is unavailable, an appropriately trained College official will serve as a substitute. Any sanctions and remedies will be forwarded to the Chairperson and will be included in the written determination. Sanctions will be subject to appeal under this policy.

XI. APPEALS

Appeals under this policy will be heard by a single Appeal Officer. Both parties have equal rights to an impartial appeal at the following junctures:

- Upon the dismissal of a formal complaint or any allegations therein.
- Upon receiving the Chairperson's written determination regarding responsibility and, when applicable, sanctions and remedies.

Appeals may be submitted on the following bases:

- procedural irregularity that affected the outcome of the matter;
- new evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made which could affect the outcome of the matter;
- The Coordinator, investigator(s), or any member of the Hearing Panel, or Sanction Officer had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

To appeal, a party must electronically submit a written appeal statement to the Title IX Coordinator within five (5) business days of receipt of the written determination or dismissal. The Appeal Officer may deem a late submission reasonable only under

extenuating circumstances, and may decide in their sole discretion what constitutes valid extenuating circumstances.

The appeal shall consist of a written statement not to exceed five (5) double spaced pages, outlining the basis for appeal and the relevant information to substantiate the appeal. The non-appealing party will be provided with a copy of the appealing party's written statement and may submit a written response, not to exceed not to exceed five (5) double spaced pages, to the Title IX Coordinator within five (5) business days of receipt of the appealing party's written statement. The non-appealing party's statement will be provided to the appealing party. No further appeal submissions from the parties shall be permitted.

An appeal is limited in scope. The purpose of an appeal is not to initiate a review of substantive issues of fact or a new determination of whether a violation of College rules has occurred. In deciding an appeal, the Appeal Officer may consider the case file and any responses, investigative report and any responses, the hearing record, the written determination, and any written appeal(s) or statements by the parties. The Appeal Officer also may consider any other materials the College deems relevant and that have been shared with the parties.

The parties and their advisors will simultaneously be provided (via electronic format) with the written decision describing the result of the appeal and the rationale for the result.

- If the Appeal Officer finds that:
 - the earlier decision should stand, the parties will be so informed and the College Sexual Misconduct process is concluded.
 - there was procedural irregularity that affected the outcome of the matter, the matter will be remanded to the Chief Hearing Officer to determine appropriate further action.
 - new evidence is available which was not reasonably available at the time of the determination regarding responsibility or dismissal, and such evidence could alter the outcome of the matter, the matter will be remanded to the Chief Hearing Officer for appropriate further action.
 - the Coordinator, Investigator, or member of the Hearing Panel, or Sanction Officer had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter,

the Appeal Officer will take appropriate measures to address and remediate the impact of the bias or conflict consistent with the general procedures of this policy.

The Appeal Officer will endeavor to complete the appeal review within fifteen (15) days following receipt of the party's appeal statements.

The determination regarding responsibility becomes final either on the date that the parties are provided with the written determination of the result of an appeal if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

A. Potential Sanctions for Violations

Sanctions for a finding of responsibility depend upon the nature and gravity of the misconduct, and the adjudication and/or disciplinary procedures applicable to the Respondent. In general, sanctions for violations of the Sexual Misconduct Policy may include, without limitation, withholding a promotion or pay increase, reassigning employment, terminating employment, temporary suspension without pay, compensation adjustments, expulsion or suspension from the College, expulsion from campus housing, mandated counseling, educational sanctions, and/or the suspension or revocation any other privilege or benefit with respect to membership or participation in the College Community.

In cases involving Sexual Harassment, the College will also take reasonable steps to eliminate any hostile environment that has been created, such as arranging trainings and disseminating informational materials.

XII. PREVENTION AND AWARENESS

The Title IX Coordinator will review and monitor the application of formal and informal resolution procedures and appeals, if applicable, concerning formal complaints alleging violations of the Sexual Misconduct Policy for compliance with the requirements of Title IX and VAWA. The College reserves the right to amend, modify, suspend and/or change any College policy, procedure or rule in order to ensure such compliance.

The College is committed to the prevention of Sexual Misconduct through education and awareness programs. Incoming students and new employees receive primary education and prevention training as part of their orientation, and returning employees and students receive ongoing training and related programs.

Resources are also available through the Campus Police Department which provides the College Community with safety information as well as programs and workshops on sexual assault, crime prevention, and personal safety.

The College has created a Title IX advisory group consisting of administrators from across the College community including representatives from, among other areas, Student Affairs, Athletics, Residential Life, Public Safety, and Academic Affairs. This group advises the Title IX Coordinator with respect to the application of the College's Title IX policies and procedures, and acts as a resource in the planning, coordination, implementation, and evaluation of the College's Title IX compliance activities.

XIII. GENERAL

The College reserves the right to modify this Policy and the procedures herein to take into account applicable legal requirements, to address extraordinary circumstances, and/or as it deems necessary to further the purpose and intent of the Policy.

In order to comply with FERPA and Title IX and to provide an orderly process for the presentation and consideration of relevant information without undue intimidation or pressure, the investigation and resolution procedures applicable to issues of Sexual Misconduct are not open to the general public. Accordingly, documents prepared and/or submitted in connection with proceedings including but not limited to complaints, reports, notices, summaries, recordings, transcripts, or other information may not be disclosed outside of the proceedings, except as may be required or authorized by law.

The College will retain documentation (including but not limited to the written complaint, notifications, the investigation materials, reports, recordings or transcriptions of hearings, findings of fact, petitions for appeal, and any written communications to or from the parties), for at least seven years. Documentation pertaining to expulsions or educational sanctions may be retained indefinitely.

APPENDIX A

Definitions

The following are provided to give further definition to some of the terms referenced in the Sexual Misconduct Policy. Any questions concerning the definition, meaning or application of any term of the Sexual Misconduct Policy should be directed to the Title IX Coordinator.

Assigned Title IX Coordinator. The “Assigned Title IX Coordinator” means either the Title IX Coordinator or the Deputy Title IX Coordinator assigned by the Title IX Coordinator or President to handle a given Complaint.

Clery Act. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the “Clery Act”) is a federal statute codified at 20 U.S.C. § 1092(f), with implementing regulations in the U.S. Code of Federal Regulations at 34 CFR 668.46. The Clery Act requires all college and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their respective campuses.

Complainant. Refers to the individual(s) who is alleged to be the victim of Sexual Misconduct as defined in College’s Sexual Misconduct Policy.

Day. A “day” is a business day, unless otherwise specified.

FERPA. The Family Educational Rights and Privacy Act (“FERPA”) is a federal statute codified at 20 U.S.C. § 1232g, with implementing regulations at 34 CFR Part 99. FERPA protects the privacy of student education records. FERPA grants to parents or eligible students the right to access, inspect, and review education records, the right to challenge the content of education records, and the right to consent to the disclosure of education records.

Formal Complaint. Refers to a document filed by a Complainant (meaning a document or electronic submission (such as by email) that contains the Complainant’s physical or digital signature, or otherwise indicates that the Complainant is the individual filing the formal complaint) alleging that a respondent(s) has engaged in conduct prohibited under the College’s Sexual Misconduct Policy, and requesting that the College investigate the allegation. The College’s Title IX / Sexual Misconduct Coordinator may also initiate a Formal Complaint by signing a document alleging that a respondent(s) has engaged in conduct prohibited under the College’s Sexual Misconduct Policy. In such cases, the College Title IX / Sexual Misconduct Coordinator is not a complainant or a party to the action.

A formal complaint may be filed with the College’s Title IX / Sexual Misconduct Coordinator in person, by mail, or by electronic mail, by using the contact information provided in this Policy, and by any additional method identified in this Policy.

Investigator. a neutral fact-gatherer who is designated by the Assigned Title IX Coordinator to investigate a Complaint.

Official with Authority. Refers to the College’s Title IX / Sexual Misconduct Coordinator and Deputy Title IX / Sexual Misconduct Coordinators identified in the College’s Sexual Misconduct Policy.

Party or parties. Refer to the complainant(s) and the respondent(s).

Personally Identifiable Information. Personally Identifiable Information includes, but is not limited to:

- a person's name;
- the name of a person's parent(s) or other family members;
- the address of a person or a person's family;
- a personal identifier, such as a person's social security number, student/employee number, or biometric record;
- other indirect identifiers, such as a person's date of birth, place of birth, or mother's maiden name;
- other information that, alone or in combination, is linked or linkable to a specific person and that would allow a reasonable person in the College community, who does not have personal knowledge of the relevant circumstances, to identify the Student with reasonable certainty; or
- Information requested by a person whom the College reasonably believes knows the identity of the person to whom the information relates.

Reasonable Person. means a reasonable person under similar circumstances and with similar identities to the alleged victim.

Report. A report refers to information brought to the attention of an Official with Authority alleging that an incident(s) of conduct prohibited under the College’s Sexual Misconduct Policy has occurred; a report is not considered to be a formal complaint. A party may bring a report and then subsequently file a formal complaint.

Respondent. A “Respondent” is an individual accused of engaging in conduct prohibited under the College’s Sexual Misconduct Policy, in a Formal Complaint.

Third party refers to any individual who is not a College student, a faculty member, or a staff member (e.g., vendors, alumni/ae, or local residents).

VAWA. Section 304 of the Violence Against Women Reauthorization Act of 2013. **Witness** refers to any individual who shares information relating to an allegation of prohibited conduct under this Policy.

APPENDIX B

Suggested Actions for Victims of Sexual Violence

All types of Sexual Misconduct are inappropriate and are taken seriously by the College. In all cases, the College's first priority is to provide the victim of Sexual Misconduct with support and guidance in taking steps to address their safety and their physical and emotional health. Thus, if you have experienced a Sexual Assault or an act of Sexual Misconduct, you are strongly encouraged to seek immediate assistance.

You are encouraged to take the following actions, as applicable, regardless of whether you have made a decision about whether to pursue a criminal complaint or to make a complaint to the College.

Ensure Your Physical Safety

Immediately get to a safe place and call someone you trust. You may seek help from local law enforcement agencies or by contacting the Campus Police Department. The Campus Police Department can assist you with contacting local law enforcement and can provide or help you obtain transportation to the Worcester Police Department or to obtain medical care and/or counseling services. Contacting Police will not obligate you to file a criminal complaint or to filing a complaint with the College. Police may have an independent legal obligation to investigate reported conduct.

Campus Police Officers are on duty at the College 24 hours a day, seven days a week.

Campus Police Department
508-494-9010

Seek Medical Assistance and Treatment

It is crucial that you obtain medical attention as soon as possible after a Sexual Assault to determine and treat physical injury and to prevent or treat sexually transmitted diseases (such as HIV). Medical facilities can also screen for the presence of sedative drugs such as Rohypnol or GHB (date-rape drugs). Employees of the College Office of Student Health Services can help you obtain treatment and contact a support person, such as a family member, a friend or roommate.

The College encourages you to obtain medical assistance at a hospital immediately after or within 72 hours of a Sexual Assault.

In addition to obtaining care and other treatments, within this time period, a Sexual Assault Medical Examination can be conducted to evaluate the status of your health and to collect evidence that will be available in the event that you decide to pursue a criminal complaint.

Many hospitals can provide you with a SANE (Sexual Assault Nurse Examiner) nurse who has been trained to work with victims of sexual assault through the medical process. This examination is a voluntary procedure and it does not commit you to any legal action. It is an Individual's right to ask for a SANE nurse to perform the examination.

If you choose to have an Evidence Collection Kit (or "rape kit") completed, it is important to do so within 72 hours. Even if you have not decided to file charges, it is advisable to have the Evidence Collection Kit completed so that you can preserve the options of obtaining a protective order and /or filing criminal charges at a later date. Hospitals administer Evidence Collection Kits. Individuals may go directly to a hospital or may be referred to the hospital by the College's Office of Student Health Services.

In order to best preserve evidence for an Evidence Collection Kit, it is advisable to avoid showering, bathing, going to the bathroom or brushing your teeth before the kit is completed. You should also wear (or take with you in a paper – not plastic – bag) to the hospital the same clothing that you were wearing during the assault. An Evidence Collection Kit can still be completed even if you have showered or bathed.

Obtain Emotional Support

Pathways for Change can provide a free medical advocate to meet with the victim and their families in hospital emergency departments. In the immediate aftermath of a sexual assault or rape, victims face a host of emotional, medical, and legal decisions. Pathways for Change medical advocates are certified rape crisis counselors who provide information and support to the survivor and/or family at the hospital. Pathways for Change can be reached at its 24-hour hotline at **1-800-870-5905 or (for support in Spanish) 1-800-223-5001; 588 Main Street, Worcester MA 01608**

The College's Counseling Center can help individuals sort through their feelings and begin the recovery process. The professionals at the Counseling Center are trained to provide crisis intervention counseling on short-term and emergency issues. The Counseling Center can also provide referral services for outside providers and law enforcement. Counseling is free of charge to all Students.

Obtain Information / Report Misconduct

You are encouraged to report incidents of Sexual Assault to the College's Title IX/Sexual Misconduct Coordinator or other designated individuals or offices as outlined in the Sexual Misconduct Policy (even if you have filed a report directly with law enforcement). Further information about how to report Sexual Assault is provided in the College's Sexual Misconduct Policy and Procedures. College personnel can help you access resources and can provide you with support and information, including information on the College's procedures for investigating and addressing instances of Sexual Assault and other Sexual Misconduct.

APPENDIX C

On-Campus Resources

The following represent some of the resources and services available to Students and Employees.

A. On-Campus Confidential Resources

Confidential Resource Provider

The Confidential Resource Providers (“CFP”) are individuals who can provide information and support to Community Members concerning issues of Sexual Misconduct.

<p>Kelly Sullivan ksullivan@annamaria.edu 508-849-3227</p>	<p>James Bidwell jbidwell@annamaria.edu 508-849-3267</p>
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The CFP will keep confidential and will not release any confidential information provided to them by a person in connection with receiving the CFP’s services unless the person provides the CFP with written authorization. This means that the CFP will not disclose confidential information to a College official, Title IX, law enforcement, or to any agency or individual without your written consent unless compelled to do so by state or federal law.

The CRP can provide information and support concerning:

- Options for reporting Sexual Misconduct to the College and/or law enforcement
- Counselling Services
- Medical and health services
- Support services available from the College
- The Title IX process and disciplinary procedures
- Reporting to law enforcement and/or the process for pursuing legal action including protective orders

Note: Providing information to the CFP concerning an incident(s) of Sexual Misconduct does not place the College on notice of such conduct, either constructively or actually.

College Health and Counseling Center
Trinity Hall Annex
508-849-3315

Campus Ministry
Foundress Hall, Lower Level
508-849-3280

Employee Assistance Program
ACI Specialty Benefits
<http://rsli.acieap.com>

B. On-Campus Non-Confidential Resources

These on-campus non-confidential resources can provide Community Members with information and assistance with respect to reporting Sexual Misconduct to the College and/or law enforcement, obtaining supportive measures, and access to College and community resources for emergency and on-going assistance, medical treatment, counseling, support, and advocacy services.

Take Note: Employees of the following offices and departments are required to report all information (obtained directly or indirectly) about incidents of Sexual Misconduct involving a Community Member to the Title IX/ Sexual Misconduct Coordinator. They must also report information as required under the Clery Act.

Title IX / Sexual Misconduct Coordinator and Deputy Coordinator(s)

Title IX Coordinator	Corina Hendea, Director, Human Resources, Chendea@annamaria.edu , 508-849-3444
Deputy Title IX Coordinator	Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall, jeckstrom@annamaria.edu , 508-849-3271

Campus Police Department
Foundress Hall West
508-494-9010
Emergency 911
publicsafety@annamaria.edu

Campus Police Officers are available 24 hours a day, seven days a week.

Student Affairs Office

Jessica Eckstrom, Vice President for Student Affairs, 247 Trinity Hall
jeckstrom@annamaria.edu, 508-849-3271

Office staff are available from 8:30 a.m. to 4:30 p.m., Monday through Friday.

Human Resources

Corina Hendea, Director of Human Resources, Socquet House,
CHendea@annamaria.edu, 508-849-3444.

Staff are available from 8:30 a.m. to 4:30 p.m., Monday through Friday.

Resident Assistant (RA) or Residential Life Staff Member

An RA or Residential Life staff member can provide immediate support and referrals for further care.

APPENDIX D

Off-Campus Resources

Better Mynd – online confidential counseling services for students

<https://www.bettermynd.com/>

Students will set up their profile using their Anna Maria College email and will gain access to scheduling confidential counseling. BetterMynd also offers group sessions and self-guided resources.

Pathways for Change

588 Main Street
Worcester MA 01608
24/7 Hotline (800) 870-5905 / TTY (888) 887-7130
Office (508) 852-7600; Fax (508) 852-7870

Pathways for Change offers free, confidential services to sexual assault victims, their friends, and families. It also operates a 24-hour confidential hotline that provides victims of sexual assault with telephone counseling and personal support.

Counseling/Advocacy Services:

These local, state and national services provide confidential support 24-hours a day

- Daybreak Domestic Violence Services. YWCA of Central MA: (508) 755-9030
- UMass Memorial University Campus Emergency Mental Health: (508) 856-3562
- Violence Recovery Program (LGBT Services, located in Boston): (800) 834-3242 office hours & (877) 785-2020 Safelink after office hours
- National Domestic Violence Hotline: (800) 799-SAFE (7233)
- National Sexual Assault Hotline: (800) 656-HOPE (4673)
- Stalking Hotline: (800) 394-2255
- Samaritans (Suicide Prevention): (877) 870-4673
- GLBT Helpline: (888) 340-4528

Medical Facilities

Immediate medical care can be obtained at local hospitals. Several area hospitals have SANE (Sexual Assault Nurse Examiner) nurses on staff who have been trained to work with victims of sexual assault through the medical process. This examination is a voluntary procedure, and it does not commit you to any legal action. It is an individual's right to ask for a SANE nurse to perform the examination. Hospitals in the Worcester area with sexual assault nurse examiners are:

St. Vincent Hospital 123 Summer Street	UMass Memorial Medical Center Memorial Campus
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<p>Worcester, MA 01608 508-363-5000 Web site: www.stvincenthospital.com</p>	<p>119 Belmont Street Worcester, MA 01605 508-334-1000 Web site: www.umassmemorial.org</p>
<p>UMass Memorial Medical Center University Campus 55 Lake Avenue North Worcester, MA 01655 508-334-1000 Web site: www.umassmemorial.org</p>	

Law Enforcement

Paxton Police Department

576 Pleasant St, Paxton, MA 01612
Business Line: (508) 755-1104
Emergency – 911

Worcester County District Attorney’s Office

Child Abuse & Sexual Assault Unit
255 Main Street, Worcester
(508) 755-8602

Court Advocacy

Daybreak / SAFEPLAN (assistance with restraining orders)
(508) 831-2168

Victim Witness Program (advocate from DA’s office)
(508) 755-8601

Legal Assistance

Community Legal Aid

405 Main Street
Worcester, MA 01608
855-CLA-LEGAL (855-252-5342)
508-744-3260 (TTY/TTD)
<https://communitylegal.org>

Victim Rights Law Center

(617) 399-6720

Provides free, comprehensive legal services for sexual assault victims with civil legal issues in Massachusetts

Violence Recovery Program at Fenway Community Health

(800) 834-3242

Free counseling and advocacy, specializing in services to the LGBTQIA+ community.

Financial Assistance

Confidential financial assistance may be available for costs related to medical care, mental health counseling, and other expenses through the Victims of Violence Crime Compensation Program, which operates out of the Attorney General's Office. Victim Compensation (508) 755-8601.